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December 16, 2020

The Honorable Jesse M. Furman United States District Court for the Southern District of New York 500 Pearl Street New York, NY 10007

> Re: In re GM LLC Ignition Switch Litig., 14-MD-2543 (JMF) Garcia v. GM LLC, 17-CV-5970

Dear Judge Furman:

On October 2, 2020, this matter was referred to Magistrate Judge Cott for settlement purposes. (*See* 17-CV-5970, Docket No. 142.) At the parties' request, Judge Cott scheduled a telephonic settlement conference for December 15, 2020. (*See* 14-MD-2543, Docket No. 8275.) At the December 15 conference, the parties agreed to a settlement. The parties are working to execute and then implement a confidential settlement agreement. The parties anticipate that the *Garcia* plaintiffs' claims will be dismissed with prejudice in early 2021. Therefore, the *Garcia* plaintiffs and New GM respectfully request that this matter be stayed.

Respectfully submitted,

/s/ Wendy L. Bloom

Counsel for Defendant General Motors LLC

cc: MDL Counsel of Record